

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**Jason Goodman** , :  
Plaintiff, : Case No.: **1:21-cv-10878-AT-JLC**  
  
V. :  
US DISTRICT COURT JUDGE  
:  
Judge Anilisa Torres  
:  
**George Webb Sweigert** : REPLY TO RESPONSE FOR MOTION  
:  
TO DISMISS - MOTION FOR  
:  
EVIDENTIARY  
:  
HEARING IF CASE IS NOT DISMISSED  
**Defendant,**

**BACKGROUND** - The Plaintiff, Jason Goodman, continues his bad faith dealings with the Southern District of New York. Plaintiff Goodman has created such a tangle of conspiracies theories about the Defendant, George Webb Sweigert, including his family is somehow responsible for 9/11, and the Defendant George Webb Sweigert is involved in a Criminal Conspiracy with and an Officer of the Court in Federal Court of the Eastern District of Michigan. Plaintiff Goodman is under sanction in the Southern District of New York for violating a Protective Order, and the Court should not tolerate his Court play now. The Court should dismiss his frivolous and vexatious lawsuit. If not, the Defendant requests and Evidentiary Hearing to quickly cut to the truth to expedite jurisprudence.

1. Now comes George Webb Sweigert, Defendant in George Webb Sweigert v George Jason Goodman, Southern District Of New York, Case Number **1: Case No.: 1:21-cv-10878-AT-JLC.**
2. At the outset, Defendant George Webb Sweigert does not conduct business in the State of new York and has no affiliation with the web-site blog [SDNY.ORG](http://SDNY.ORG).
3. G.W. Sweigert swear under perjury the following statements are true.

4. I have read Mr. Goodman's statements contained in ECF 34, PLAINTIFF'S OPPOSITION TO DEFENDANT GEORGE WEBB SWEIGERT'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION.
5. I do not have a relationship with my brother, David George Sweigert, and do not assist in any of my brother's activities, which includes the so-called blog [SDNY.ORG](#). I do not assist in "e-mail campaigns", which New York courts have upheld does not constitute justification for long-arm statute jurisdiction.
6. To my understanding telephone calls and e-mails to New York does not grant personal jurisdiction.
7. I do not "work", coordinate, plan or communicate with Christopher E. Bouzy, Defendant. I have never spoken to or talked with Mr. Bouzy.
9. Mr. Goodman, in ECF 34, makes no statements about criminal allegations he has been accused of by myself.
10. I do not transact business in New York and I do not target New York citizens for any financial support of my citizen journalism. I have asked persons from New York specifically to give money to Neighborhood News Studio in Michigan, not myself.
11. I am not aware of Mr. Bouzy publishing anything that resulted in defamation from the so-called [SDNY.ORG](#) blog.
12. I have seen no exhibits attached to ECF 34 that support the allegations raised by Mr. Goodman in his document.
13. Pursuant to the New York Long Arm Statute I am unaware of that I am (1) transacting business within the state; (2) committing a tort within the state; (3) committing a tort outside the state causing injury within the

state, or (4) owning, using or possessing any real property situated within the state.

14. The Defendant respectfully requests an evidentiary hearing to provide appropriate fact finding as the Plaintiff only provides conclusory allegations -- which the Defendant hereby denies.
15. A non-domiciliary transacts business under § 302(a)(1) when he " `purposefully avails [himself] of the privilege of conducting activities within [New York], thus invoking the benefits and protections of its laws.' " CutCo Indus., 806 F.2d at 365 (quoting McKee Elec. Co. v. Rauland-Borg Corp., 283 N.Y.S.2d 34, 20 N.Y.2d 377, 382 (1967)); see also Agency Rent A Car Sys., Inc. v. Grand Rent A Car Corp., 98 F.3d 25, 30 (2d Cir. 1996) (citing PaineWebber, Inc. v. Westgate Group, Inc., 748 F. Supp. 115, 119-20 (S.D.N.Y. 1990)). Courts look to the totality of the circumstances to determine whether the defendant has engaged in such purposeful activity and require a "substantial nexus" between the business transacted and the cause of action sued upon. Agency Rent A Car, 98 F.3d at 31; Hoffritz, 763 F.2d at 60; see also PDK Labs, Inc. v. Friedlander, 103 F.3d 1105, 1109 (2d Cir. 1997).
16. "New York courts construe 'transacts any business within the state' more narrowly in defamation cases than they do in the context of other sorts of litigation." Best Van Lines, Inc. v. Walker, 490 F.3d 239, 248 (2d Cir. 2007) (quoting N.Y. C.P.L.R. § 302(a)(1)); Weil v. American Univ., No. 07 Civ. 7748, 2008 WL 126604, at \*6 (S.D.N.Y. Jan. 2, 2008) (discussing Best Van Lines, 490 F.3d at 248). Courts attempt to read the statute as a whole, assuring that the defamation exceptions of §§ 302(a)(2) and (3) are not swallowed. Best Van Lines,

490 F.3d at 248 n. 11 (quoting King v. St. Vincent's Hosp., 502 U.S. 215, 221 (1991)).

17. Courts in New York generally do not consider sending letters into the state, without more, sufficient to qualify as transacting business under § 302(a)(1). Id.; see also Kim v. Dvorak, 658 N.Y.S.2d 502, 504, 230 A.D.2d 286, 289 (3d Dep't 1997) (holding that sending four allegedly defamatory letters into the state does not qualify as transacting business in the state under § 302(a)(1)); Pontarelli v. Shapero, 647 N.Y.S.2d 185, 188, 231 A.D.2d 407, 410 (1st Dep't 1996) (holding that sending two allegedly defamatory letters and a facsimile into the state does not qualify as transacting business in the state under § 302(a)(1)).
18. New York courts have found sending letters into the state to be sufficient to establish jurisdiction under § 302(a)(1) when such letters were accompanied by other circumstances that solidified the party's business connection with New York. See Best Van Lines, 490 F.3d at 249 (citing Sovik v. Healing Network, 665 N.Y.S.2d 997, 244 A.D.2d 985 (4th Dep't 1997)).

**Plaintiff Goodman's History Of Egregious Behaviour In Federal Courts.**

19. The Southern District of New York has already sanctioned Plaintiff Goodman for violating a Protective Order. Yet another Court should not have to suffer Plaintiff's Court play. The Defendant moves for a supervised evidentiary hearing if this case isn't immediately dismissed as frivolous and vexatious.
20. Plaintiff Jason Goodman was likened to a Q Anon conspiracy theorist by Southern District of New York Federal Judge Valerie Caproni in a recent case. Judge Capromi's clear judgement should be affirmed here that Plaintiff

Goodman is not capable of an unsupervised Discovery process. Clearly, Plaintiff Goodman feels no constraints in making up conspiracy theories which now include Officers of the Court, and Federal Judges. An evidentiary hearing in front of the Court will get to the crux of the Discovery needs quickly, and a great deal of Court play can be avoided.

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THE NATIONAL ACADEMY OF TELEVISION : ARTS AND SCIENCES, INC. and ACADEMY : OF TELEVISION ARTS & SCIENCES, : :		
Plaintiffs, : :		20-CV-7269 (VEC)
-against- : :		<u>ORDER</u>
MULTIMEDIA SYSTEM DESIGN, INC. : d/b/a "CROWDSOURCE THE TRUTH", : :		
Defendant. : ----- X		

VALERIE CAPRONI, United States District Judge:

In late 2020, the National Academy of Television Arts and Sciences and the Academy of Television Arts & Sciences sued Multimedia System Design, Inc., d/b/a Crowdsource the Truth ("MSD") for violating its copyright and trademark on the Emmy statuette and for defamation. *See Compl.*, Dkt. 1; *see also Am. Compl.*, Dkt. 62. Thus began litigation that has now ended with a default judgment being entered against the Defendant following its failure to hire an attorney to represent it after its initial attorney was relieved. This Order addresses misconduct by the sole shareholder and employee of MSD, Jason Goodman, in connection with this litigation. Mr. Goodman is a conspiracy theorist who has an ongoing feud with D. George Sweigert ("Mr.

A fundamental argument which Jason Goodman has promoted in his efforts to recuse Judge Valerie Caproni is found, for example, in Document 324 filed November 10, 2021 in the *D. George Sweigert vs. Jason Goodman* lawsuit, declaring, " In a hearing before Judge Caproni on October 25, 2021, during oral testimony the judge interrupted and prevented me from delivering my statement. **Judge Caproni mocked and criticized me, claiming I was like 'Qanon'.** This vile insult is irrelevant to the case, has no validity and is unsupported by any evidence....". [bolding added.]

21.

22. Plaintiff Jason Goodman has vexatiously targeted Federal Judge Valerie Caproni, pursuing investigations against her and moving to have her recused from his cases twice rather than accepting her clear judgment.

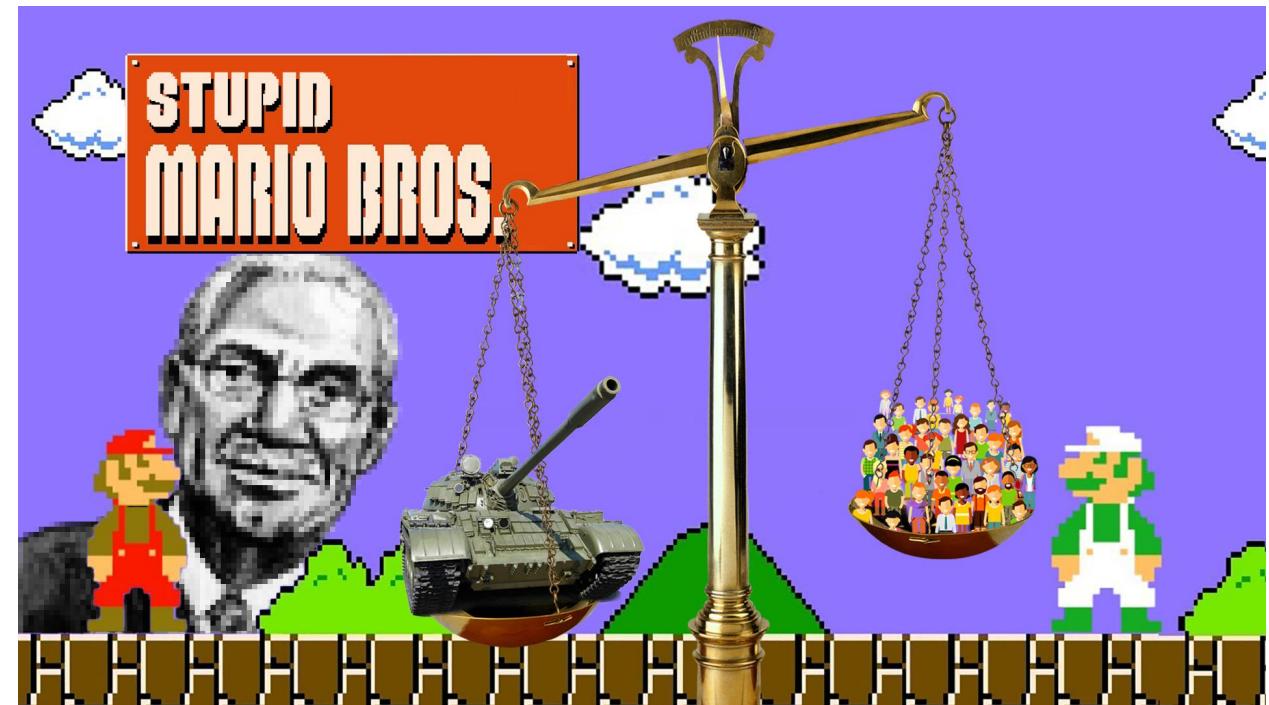


The screenshot shows a news article from Law.com. The title is "Television Academy Wins Injunction Against Conspiracy Theorist". Below the title, it says "Feb. 23, 2022, 12:12 PM". There are social media sharing buttons for Facebook, LinkedIn, and Twitter. A sidebar on the right features a photo of Isaiah Poritz, Legal Reporter, with links to "Documents", "Order S.D.N.Y. Docket", and "Order". The main text of the article discusses a court ruling where the National Academy of Television Arts and Sciences won an injunction against Crowdsource the Truth for using an Emmy award statuette in a video, and Plaintiff Jason Goodman faces additional sanctions.

23.

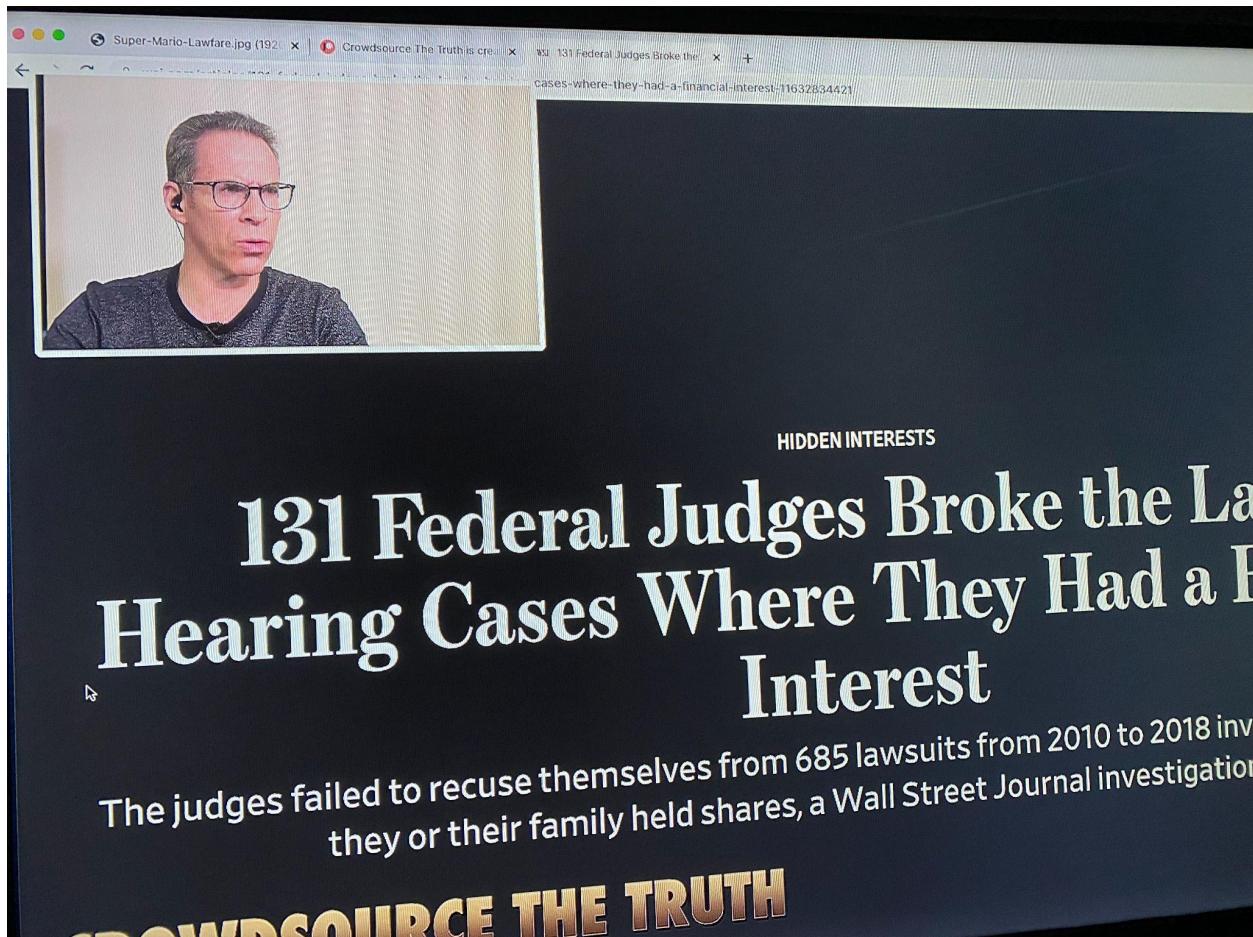
24. Plaintiff Jason Goodman has not limited his wild conspiracy theories and vexatious attacks on Defendant George Webb Sweigert. Plaintiff Goodman's attacks include Court personnel to the Southern District of Michigan. Plaintiff Jason Goodman intervened into the Eastern District of Michigan Federal Court as a Non-party in July 2021 into Sweigert v CNN, 2:20-cv-12933, with an entirely false, malicious, vexatious Amicus Brief, accusing the Defendant, George Webb

Sweigert, into a Felony Conspiracy to commit Fraud On The Court with Pro Se Administrator, Richard Loury. Richard Loury is an Officer of the Court in the Eastern District of Michigan. An image of the Honorable Judge Harold Drain is satirized in a broadcast by Plaintiff Jason Goodman under the heading “Stupid Mario Brothers”.



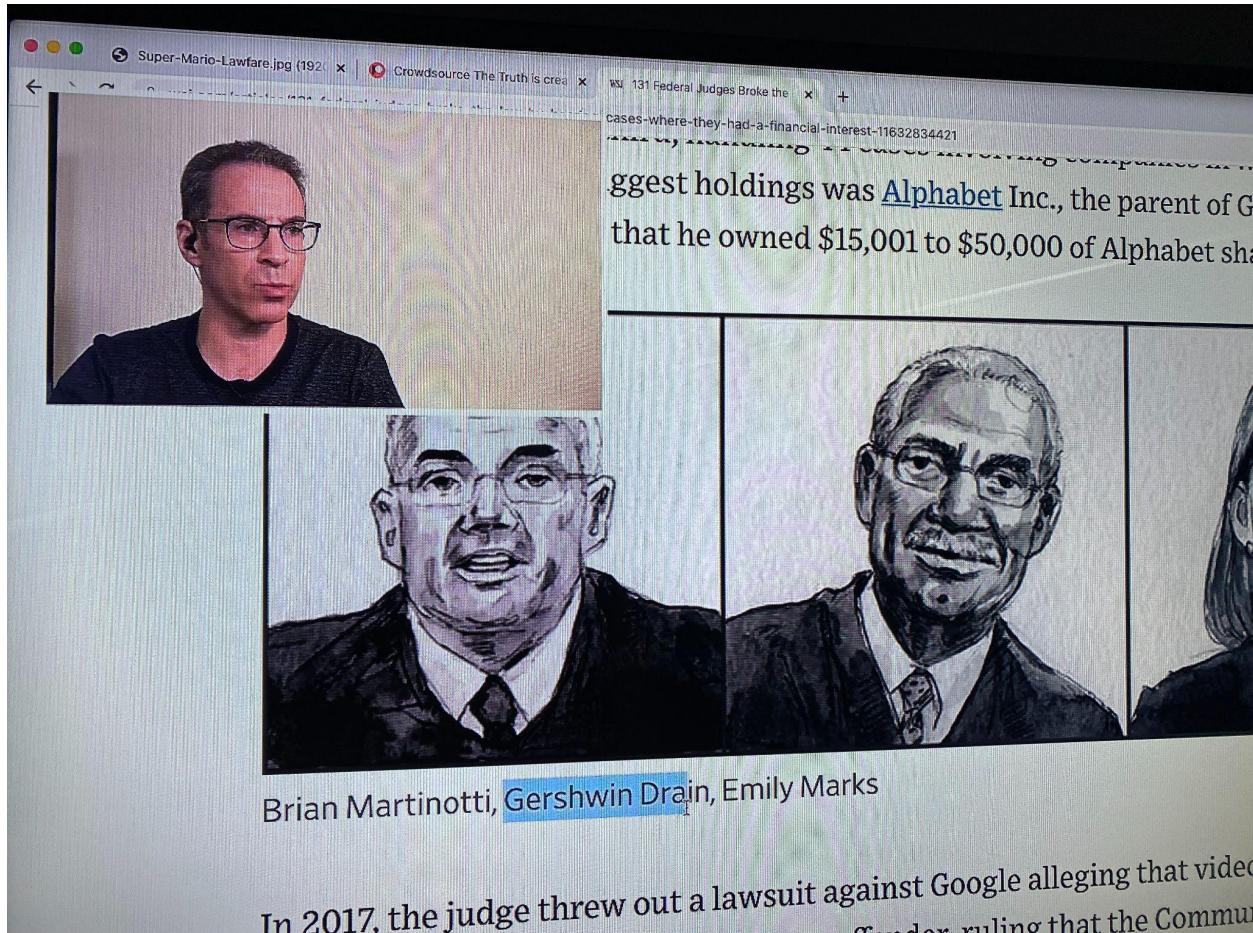
25.

26. Since July of 2021, the Plaintiff Goodman has continually repeated these malicious and false claims about Defendant George Webb Sweigert and Court Officer Richard Loury on his YouTube channels, “Crowd Source The Truth”, almost daily, and on his Patreon pay channel, “The Counter Lawfare Show”.



28. Plaintiff Jason Goodman initiated a smear campaign against Federal Judge Harold Drain instead of just listening to his good advice not to harass Court Officers at home and on weekends. Plaintiff Goodman has shown he does not respect the authority of the Court by initiating FBI investigations against a Federal Judge. Plaintiff Goodman frivolous and vexatious complaint should be

dismissed out of hand.



29. The Plaintiff, Jason Goodman, is an unhinged conspiracy theorist that has made us so many conspiracy theories about the Defendant George Webb Sweigert, the Court should dismiss this case out of hand. Jason Goodman is mentally unstable. In this video, he screams in the face of a baby, blocking the baby stroller from crossing a busy New York City street. Mr. Goodman makes money performing these “shock journalism” stunts.

## Watch Jason Goodman attack a baby at 1:20:10

⟳ Inbox × Pics ×

**Spoliation Notice** <spoliation-notice@mailbox.org>

Thu, Dec 30, 2021, 8:17 PM



to Spoliation, spoliation@posteo.net, me, maryanne.beckett@caller.com, kathryn.cargo@caller.com, tom.whi



Watch Jason Goodman attack a baby at 1:20:10

[https://www.youtube.com/watch?v=90\\_Jtqt-JtE](https://www.youtube.com/watch?v=90_Jtqt-JtE)

30.

31. In the same video, Plaintiff Jason Goodman can be heard screaming “Go Back To Afghanistan!” to three generations of an immigrant family walking their baby.

32. Plaintiff Jason Goodman somehow believes I am involved with a plot to cause

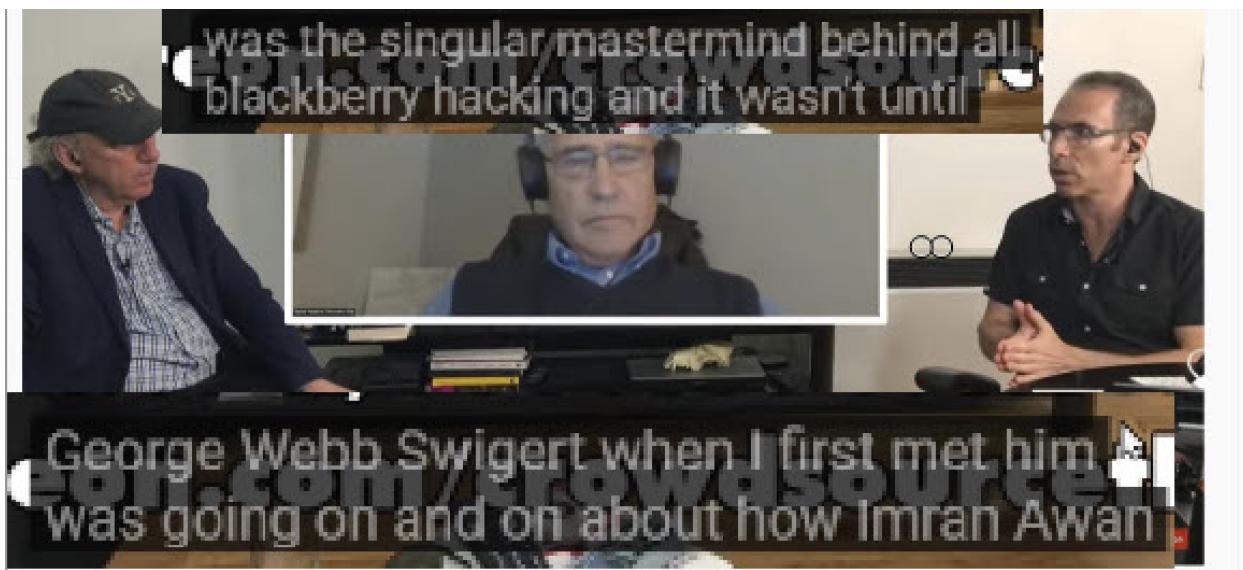
9/11 with my brother. Plaintiff Goodman has done numerous shows with Canadian YouTuber David Hawkins explaining how my brother “left the Federal Bridge open”, leading to the deaths of all the victims of 9/11, David Hawkins also has done numerous broadcasts with Plaintiff Jason Goodman alleging that President Bill Clinton uses the “Federal Bridge” for a child rape ring, in some way betting on which children will survive at a place called the “Piggy Palace” in Vancouver, BC. Goodman and Hawkins have made many field trips to the “Piggy Palace” in Vancouver, BC. Mr. Goodman be taken seriously by this Court, and his case should be dismissed out of hand. If not, the Defendant requests and evidentiary hearing to quickly cut to truth and expedite jurisprudence in this

case.



Does Federal Bridge Link Princess Di's D'Alma Tunnel to the 47th floor on 9/11? with David Hawkins

*Jason Goodman and David Hawkins concocted a ridiculous conspiracy theory that my brother, David George Sweigert, “left open the Federal Bridge to cause 9/11”.*



34. I, George Webb Sweigert, the Defendant, has tried to just laugh off these ridiculous conspiracy theories that have gone on for six years now, but the conspiracy theories are now starting to harm Officers of the Court, Federal Judges, and innocent people of color who just seem to be convenient targets. (Plaintiff Jason Goodman has publicly stated I am intelligence agent for former President Barak Obama with YouTube shows like American Intelligence Media.

A fundamental argument which Jason Goodman has promoted in his efforts to recuse Judge Valerie Caproni is found, for example, in Document 324 filed November 10, 2021 in the *D. George Sweigert vs. Jason Goodman* lawsuit, declaring, " In a hearing before Judge Caproni on October 25, 2021, during oral testimony the judge interrupted and prevented me from delivering my statement. **Judge Caproni mocked and criticized me, claiming I was like 'Qanon'.** This vile insult is irrelevant to the case, has no validity and is unsupported by any evidence....".  
[bolding added.]

35.

36. Plaintiff Jason Goodman has vexatiously targeted Federal Judge Valerie Caproni, pursuing investigations against her and moving to have her recused from his cases twice rather than accepting her clear judgment.

37. Plaintiff Goodman attacks on Court personnel didn't stop with initiating Federal investigations of members of the Court. In February of 2022, Plaintiff Jason Goodman made a series of harassing phone calls to Court personnel after hours and on the weekends. This harassing phone calls triggered a Zoom conference by Judge Drain to review Plaintiff Goodman's harassing behavior.

38. On March 4th, 2022 in Zoom conference with the Honorable Judge Gershwin Drain, Plaintiff Jason Goodman failed to inform the Michigan Court he was under Sanction in the Southern District of New York Court for willfully violating

a Protective Order by the Court. Plaintiff Jason Goodman has shown a long history of Bad Faith in his dealings with the Court, and his conspiracy theories in this Complaint should be dismissed out of hand. He cannot be taken seriously by this Court, and his frivolous and vexatious lawsuit should be dismissed out of hand.

39. Instead of simply ceasing and desisting from the Plaintiff's Defamations of the Court Officers and Defendant George Webb Sweiert, Plaintiff Goodman compounded his Defamations with fresh accusations of Fraud on the Court, Forgery, and Illegal Practice of Law by Pro Se Administrator Loury, and Felony Conspiracy between Pro Se Administrator and Defendant George Webb Sweigert in an Amended Amicus Brief on March 17th, 2022. Again, Plaintiff Jason Goodman targets an innocent Afro-American Officer of the Court just doing his job in an unhinged conspiracy theory. Plaintiff Goodman cannot be taken seriously by this Court, and his frivolous and vexatious lawsuit should be dismissed out of hand. If not, the Defendant requests and Evidentiary Hearing to quickly cut to the truth to expedite jurisprudence in this case.

#### **BAD FAITH HISTORY IN FEDERAL COURT BY Plaintiff GOODMAN**

**40. Plaintiff GOODMAN IS UNDER SANCTION FROM A FEDERAL JUDGE IN THE SOUTHERN DISTRICT OF NEW YORK AND IS REQUIRED TO INFORM THIS COURT OF THE FACT BY MARCH 22ND, 2022 1:21-cv-10627.**

**41. Plaintiff GOODMAN HAS BEEN FOUND TO BE INVOLVED IN VIOLATION OF A PROTECTIVE ORDER ISSUED BY A FEDERAL**

**JUDGE, 1:21-cv-10627 AND NOT INFORMING OTHER COURTS LIKE  
THE EASTERN DISTRICT OF VIRGINIA.**

**42. RECORD OF FEDERAL LAWSUITS INVOLVING JASON GOODMAN**

**Southern District of New York**

**1:21-cv-10627-VEC Jason Goodman v. Adam Sharp et al, Valerie E. Caproni,  
presiding, Date filed: 12/13/2021**

**1:21-cv-10878-AT-JLC Jason Goodman v. George Sweigert and Chris Bouzy  
et al, Analisa Torres, presiding, Date filed: 12/19/2021**

**1:20-cv-07269-VEC The National Academy of Television Arts and Sciences,  
Inc. et al v. Multimedia System Design, Inc., Valerie E. Caproni, presiding,  
Date filed: 09/04/2020**

**Eastern District of Michigan**

**2:22-cv-10002-GAD-KGA George Sweigert v. Goodman, Gershwin A. Drain,  
presiding, Date filed: 01/03/2022**

**2:20-cv-12933-GAD-KGA George Sweigert v. Cable News Network, Inc.,  
Gershwin A. Drain, presiding, Date filed: 10/31/2020**

**Eastern District of Virginia**

**3:21-cv-00573-JAG Steele et al v. Goodman, John A. Gibney, Jr, presiding,  
Date filed: 09/28/2020**

**Plaintiff GOODMAN'S FALSE, MALICIOUS, AND VEXATIOUS ATTACKS ON  
Defendant GEORGE WEBB SWEIGERT AND COURT OFFICER RICHARD  
LOURY CONSTITUTE BAD FAITH IN THE US FEDERAL COURT OF THE  
EASTERN DISTRICT OF MICHIGAN AND IN ALL FEDERAL COURTS.**

43. By entering into the Federal Court of the Eastern District of Michigan and making outrageous, false, and malicious Fraud allegations against Officers of this Court after the Original Complaint was filed, Plaintiff Goodman has demonstrated Bad Faith in this lawsuit as well. and he cannot be entrusted with unsupervised Discovery.

44. Due to Plaintiff Goodman's outrageous use of law enforcement in an attempt to undermine the Michigan Court in addition to harassing phone calls after hours and on weekends to many Court Officers, Plaintiff Goodman has demonstrated Bad Faith in this lawsuit as well, and he cannot be taken seriously by this Court. Plaintiff Goodman's lawsuit should be dismissed out of hand.

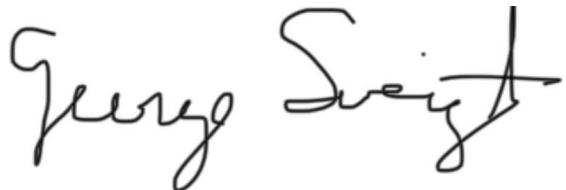
45. By appearing in a Sanctions hearing before Judge Drain on March 4th, 2022 to discuss Plaintiff Goodman's outrageous behavior in invoking law enforcement investigations on Officers of the Court, Plaintiff Goodman has demonstrated Bad Faith in this lawsuit, and he cannot be taken seriously by this Court. Plaintiff Goodman's lawsuit should be dismissed out of hand.

**BEST EFFORTS WERE MADE TO GET Plaintiff GOODMAN TO CEASE AND  
DESIST FALSE ALLEGATIONS ABOUT Defendant GEORGE SWEIGERT OF  
FELONY CONSPIRACY TO COMMIT FRAUD WITH RICHARD LOURY,  
OFFICER OF THE COURT.**

46. Every possible effort was made to get the Plaintiff Jason Goodman to cease and desist his false allegations over the last six years. I have entered into no Conspiracy with any member of my family, no Officers of the Court, no Federal Judges, no innocent

people of color. Plaintiff Jason Goodman fails to state any claim whatsoever with any evidence linking me to Chris Bouzy or any member of my family in the 9/11 tragedy. Plaintiff Goodman ceaselessly has broadcast my family somehow caused 9/11, and somehow, three African American men, two of whom have long, distinguished careers as Officers of the Court, are somehow involved in a Conspiracy with me.

47. Respectfully ask the Court to call an evidentiary hearing to get to the jist of the Discovery process quickly in the interest of judicial efficiency and clarity. Plaintiff Goodman has a history of Bad Faith in his dealings with the Southern District of New York, and his lawsuit should be dismissed out of hand, submitted this 23rd day of June, 2022,

A handwritten signature in black ink, appearing to read "George Webb Sweigert". The signature is fluid and cursive, with "George" on the left, "Webb" in the middle, and "Sweigert" on the right. The "e" in "Webb" and the "g" in "Sweigert" are capitalized and have distinct loops.

George Webb Sweigert (pro se),

207 St. Simons Cove  
Peachtree City, Georgia

Signed this day of June 23rd, 2022

